



County of Los Angeles
DEPARTMENT OF CHILDREN AND FAMILY SERVICES

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October 12, 2016

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From: Philip L. Browning
Director

WESTSIDE CHILDREN'S CENTER FOSTER FAMILY AGENCY FISCAL ASSESSMENT AND CONTRACT COMPLIANCE MONITORING REVIEW

The Department of Children and Family Services (DCFS) Contracts Administration Division (CAD) conducted a Fiscal Compliance Assessment and Contract Compliance Review of the Westside Children's Center Foster Family Agency (the FFA) in March 2016. The FFA has one licensed office in the Second Supervisorial District and provides services to the County of Los Angeles DCFS placed children. According to the FFA's Program Statement, its stated purpose is "to provide an interdisciplinary resource that provides crucial support to our community by uniting and strengthening families so that all children can achieve their optimal growth and development and reach their full potential in the safety of permanent and nurturing families."

At the time of the review, the FFA supervised 13 DCFS placed children in 11 Certified Foster Homes (CFHs). The children's average length of placement was 11 months and their average age was one.

SUMMARY

CAD conducted a Fiscal Compliance Assessment which included an agency-wide review of the FFA's financial records such as financial statements, bank statements, check register, and personnel files to determine their compliance with the terms, conditions, and requirements of the FFA Contract, the Auditor-Controller Contract Accounting and Administration Handbook (A-C Handbook) and other applicable federal, State, and County regulations and guidelines.

The FFA was in full compliance with 4 of 5 applicable areas of the Fiscal Compliance Assessment: Financial Overview; Loans, Advances and Investments; Board of Directors and Business Influence; and Payroll and Personnel.

CAD noted deficiencies in the area of Cash Expenditures, related to one petty cash replenishment check made payable to cash.

"To Enrich Lives Through Effective and Caring Service"

During CAD's Contract Compliance Review, all placed children were three years old and under. The children were observed to be safe, having been provided with good care and appropriate services, being comfortable in their environment, and being treated with respect and dignity. The Certified Foster Parents (CFPs) reported being supported by the FFA staff in their efforts to provide care and supervision to the children placed in their homes.

The FFA was in full compliance with 8 of 11 applicable areas of CAD's Contract Compliance Review: Licensure/Contract Requirements; Facility and Environment; Education and Workforce Readiness; Health and Medical Needs; Psychotropic Medication; Personal Rights and Social/Emotional Well-Being; Personal Needs/Survival and Economic Well-Being; and Discharged Children.

CAD noted deficiencies in the following areas: Certified Foster Homes, related to the FFA not completing safety inspections timely; Maintenance of Required Documentation and Service Delivery, related to the FFA not obtaining the DCFS Children's Social Worker's (CSW's) authorization to implement the Needs and Services Plans (NSPs), the FFA social worker not developing timely or comprehensive Initial and Updated NSPs; and Personnel Records, related to one employee not submitting criminal clearances prior to hire date and not signing a criminal background statement in a timely manner.

Attached are the details of CAD's review.

REVIEW OF REPORT

On April 6, 2016, Rosalind Arrington, DCFS CAD and Aiyana Rios, DCFS Out-of-Home Care Management Division (OHCMD) held an exit conference with the FFA representatives: Erika Hartman, Child Welfare Department Director; Robyn Harrod, Interim Director of Foster Care & Adoptions; and Jill Rosenberg, Foster Family Agency Supervisor. On April 5, 2016, Helga Kiaian, DCFS CAD held the Fiscal exit conference with the FFA representative Richard Klein, Chief Financial Officer. The FFA representatives agreed with the review findings and recommendations, were receptive to implementing systemic changes to improve compliance with regulatory standards, and to addressing any noted deficiencies in a Fiscal Corrective Action Plan (FCAP) and a Compliance Review Corrective Action Plan (CAP).

A copy of this compliance report has been sent to the Auditor Controller and Community Care Licensing.

The FFA provided the attached approved FCAP and CAP addressing the recommendations noted in this report.

PLB:KR
LTI:ra

Attachments

c: Sachi A. Hamai, Chief Executive Officer
John Naimo, Auditor-Controller
Public Information Office
Audit Committee
Heather Carrigan, Chief Executive Officer, Westside Children's Center
Lajuannah Hills, Regional Manager, Community Care Licensing Division
Lenora Scott, Regional Manager, Community Care Licensing Division

**WESTSIDE CHILDREN'S CENTER
FISCAL COMPLIANCE ASSESSMENT REVIEW
FISCAL YEAR 2015 – 2016**

SCOPE OF REVIEW

The Fiscal Compliance Assessment included a review of the Westside Children's Center (the FFA) financial records for the period of July 1, 2014 through January 2016. CAD reviewed the financial statements, bank statements, check register, and personnel files to determine the FFA's compliance with the terms, conditions and requirements of the FFA contract, the Auditor-Controller Contract Accounting and Administration Handbook (A-C Handbook), and other applicable federal, State, and County regulations and guidelines.

The on-site Fiscal Compliance Assessment review focused on five key areas of internal controls:

- Financial Overview,
- Loans, Advances and Investments,
- Board of Directors and Business Influence,
- Cash/Expenditures, and
- Payroll and Personnel.

The FFA was in full compliance with 4 of 5 applicable areas of the Fiscal Compliance Assessment: Financial Overview; Loans, Advances and Investments; Board of Directors and Business Influence; and Payroll and Personnel.

FISCAL COMPLIANCE

CAD found the following one area out of compliance:

Cash/Expenditures

- One petty cash replenishment check was made payable to cash.

The FFA has changed its internal policy. The check dated December 8, 2015 was the last check made payable to cash.

Recommendation:

The FFA's management shall ensure that:

1. Checks are not made payable to cash.

PRIOR YEAR FISCAL COMPLIANCE ASSESSMENT FOLLOW-UP

CAD's last Fiscal Compliance Assessment dated January 12, 2016 (assessment conducted in April 2015), identified five recommendations. CAD verified that four recommendations were implemented.

NEXT FISCAL COMPLIANCE ASSESSMENT

The next Fiscal Compliance Assessment of the FFA will be conducted in County Fiscal Year 2016-2017.

**WESTSIDE CHILDREN'S CENTER FOSTER FAMILY AGENCY
CONTRACT COMPLIANCE MONITORING REVIEW SUMMARY**

**5721 W. Slauson Avenue, Suite 120
Los Angeles, CA 90230
License Number: 197804924**

Contract Compliance Monitoring Review		Findings: March 2016
I	<u>Licensure/Contract Requirements</u> (7 Elements) <ol style="list-style-type: none"> 1. Timely Notification for Child's Relocation 2. Timely, Cross-Reported SIRs 3. Runaway Procedures in Accordance with the Contract 4. Are there CCL Citations/OHCMD Safety Reports 5. If Applicable, FFA Ensures Complete Required Whole Foster Family Home Training 6. FFA Pays Certified Foster Parents (CFPs) Whole Foster Family Home Payments 7. FFA Conducts an Assessment of CFP Prior to Placement of Two or More Children 	Full Compliance (All)
II	<u>Certified Foster Homes</u> (12 Elements) <ol style="list-style-type: none"> 1. Home Study and Safety Inspection Conducted Prior to Certification 2. Agency's Inquiry with OHCMD for Historical Information Prior to Certification 3. Timely, Criminal Clearances from Federal Bureau of Investigation (FBI), California Department of Justice (DOJ), Child Abuse Central Index (CACI) Prior to Certification 4. Timely, Completed, Signed Criminal Background Statement 5. Health Screening & Tuberculosis (TB) Test Prior to Certification 6. All Required Training Prior to Certification 7. Certificate of Approval on File/Including Capacity 8. Safety Inspection Completed At Least Every Six Months or Per Approved Program Statement 9. Completed Annual Training Hours for Re-certification and Current CPR/First-Aid/Water Safety Certificates 10. Current Driver's License (DL) /Auto Insurance/Annual Vehicle Maintenance Documentation for CFPs and Designated Drivers 11. Criminal Clearances and Health Screening/DL/CPR/ FBI/DOJ/CACI/Auto 	<ol style="list-style-type: none"> 1. Full Compliance 2. Full Compliance 3. Full Compliance 4. Full Compliance 5. Full Compliance 6. Full Compliance 7. Full Compliance 8. Improvement Needed 9. Full Compliance 10. Full Compliance 11. Full Compliance

WESTSIDE CHILDREN'S CENTER FOSTER FAMILY AGENCY CONTRACT COMPLIANCE
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	Insurance for Other Adults in the Home 12. FFA Assists CFPs in Providing Transportation Needs	12. Full Compliance
III	<u>Facility and Environment (7 Elements)</u> 1. Exterior/Grounds Well Maintained 2. Common Areas Well Maintained 3. Children's Bedrooms/Interior Well Maintained 4. Sufficient and Appropriate Educational Resources 5. Adequate Perishable and Non-Perishable Food 6. CFP Conducted Disaster Drills and Documentation Maintained 7. Money and Clothing Allowance Logs Maintained	Full Compliance (All)
IV	<u>Maintenance of Required Documentation and Service Delivery (10 Elements)</u> 1. FFA Obtains or Documents Efforts to Obtain DCFS Children's Social Worker's (CSW) Authorization to Implement NSPs 2. CFPs Participated in Development of the NSPs 3. Children Progressing Towards Meeting NSP Goals 4. FFA Social Workers Develop Timely, Comprehensive Initial NSP with the Child's Participation 5. FFA Social Workers Develop Timely, Comprehensive Updated NSPs with the Child's Participation 6. Therapeutic Services Received 7. Recommended Assessments/Evaluations Implemented 8. DCFS Children Social Workers Monthly Contacts Documented in Child's Case File 9. FFA Social Workers Develop Timely, Comprehensive Quarterly Reports 10. FFA Social Workers Conduct Required Visits	1. Improvement Needed 2. Full Compliance 3. Full Compliance 4. Improvement Needed 5. Improvement Needed 6. Full Compliance 7. Full Compliance 8. Full Compliance 9. Full Compliance 10. Full Compliance
V	<u>Educational and Workforce Readiness (5 Elements)</u> 1. Children Enrolled in School Within Three School Days 2. Children Attend School as Required and FFA Facilitates in Meeting Children's Educational Goals 3. Current Children's Report Cards/Progress Reports Maintained 4. Children's Academic Performance and/or	Full Compliance (All)

WESTSIDE CHILDREN'S CENTER FOSTER FAMILY AGENCY CONTRACT COMPLIANCE
REVIEW
PAGE 3

	<p>Attendance Increased</p> <p>5. FFA Facilitates Child's Participation in YDS or Equivalent Services and Vocational Programs</p>	
VI	<p><u>Health and Medical Needs</u> (4 Elements)</p> <ol style="list-style-type: none"> 1. Initial Medical Exams Conducted Timely 2. Follow-Up Medical Exams Conducted Timely 3. Initial Dental Exams Conducted Timely 4. Follow-Up Dental Exams Conducted Timely 	Full Compliance (All)
VII	<p><u>Psychotropic Medication</u> (2 Elements)</p> <ol style="list-style-type: none"> 1. Current Court Authorization for Administration of Psychotropic Medication 2. Current Psychiatric Evaluation Review 	Full Compliance (All)
VIII	<p><u>Personal Rights and Social/Emotional Well-Being</u> (10 Elements)</p> <ol style="list-style-type: none"> 1. Children Informed of Agency's Policies and Procedures 2. Children Feel Safe in the CFP Home 3. CFPs' Efforts to Provide Nutritious Meals and Snacks 4. CFPs Treat Children with Respect and Dignity 5. Children Allowed Private Visits, Calls and to Receive Correspondence 6. Children Free to Attend or Not Attend Religious Services/Activities of Their Choice 7. Children 's Chores Reasonable 8. Children Informed About Their Medication and Right to Refuse Medication 9. Children Aware of Right to Refuse or Receive Medical, Dental and Psychiatric Care 10. Children Given Opportunities to Participate in Extracurricular Activities, Enrichment and Social Activities at the CFH, School, and Community 	Full Compliance (All)
IX	<p><u>Personal Needs/Survival and Economic Well-Being</u> (7 Elements)</p> <ol style="list-style-type: none"> 1. Clothing Allowance Provided in Accordance with FFA Program Statement 2. Ongoing Clothing Inventories of Adequate Quantity and Quality 3. Children's Involvement in Selection of Their Clothing 4. Provision of Sufficient Supply of Clean Towels and Personal Care Items Meeting Ethnic Needs 	Full Compliance (All)

WESTSIDE CHILDREN'S CENTER FOSTER FAMILY AGENCY CONTRACT COMPLIANCE
 REVIEW
 PAGE 4

	5. Minimum Weekly Monetary Allowances 6. Management of Allowance/Earnings 7. Encouragement and Assistance with a Life Book or Photo Album	
X	<u>Discharged Children</u> (3 Elements) 1. Completed Discharge Summary 2. Attempts to Stabilize Children's Placement 3. Child Completed High School (if applicable)	Full Compliance (All)
XI	<u>Personnel Records</u> (9 Elements) 1. Criminal Clearances (FBI, DOJ, CACI) Signed and Submitted Timely 2. Timely, Completed, Signed Criminal Background Statement 3. FFA Social Workers Met Education/Experience Requirements 4. Timely Employee Health Screening/TB Clearances 5. Valid Driver's License (DL) and Auto Insurance 6. FFA Employees Signed Copies of FFA Policies and Procedures 7. FFA Employees Completed All Required Training and Documentation Maintained 8. FFA Social Workers Have Appropriate Caseload Ratio 9. FFA Maintained Written Declarations for Part-Time Contracted FFA Social Workers Caseloads Not to Exceed a Total of 15 Children	1. Improvement Needed 2. Improvement Needed 3. Full Compliance 4. Full Compliance 5. Full Compliance 6. Full Compliance 7. Full Compliance 8. Full Compliance 9. Full Compliance

**WESTSIDE CHILDREN'S CENTER FOSTER FAMILY AGENCY
CONTRACT COMPLIANCE REVIEW
FISCAL YEAR 2015-2016**

SCOPE OF REVIEW

The following report is based on a "point in time" review. This compliance report addresses findings noted during the March 2016 review. The purpose of this review was to assess the Westside Children's Center Foster Family Agency's (the FFA's) compliance with its County contract and State regulations and included a review of the FFA's Program Statement, as well as internal administrative policies and procedures. The review covered the following 11 areas:

- Licensure/Contract Requirements,
- Certified Foster Homes,
- Facility and Environment,
- Maintenance of Required Documentation and Service Delivery,
- Educational and Workforce Readiness,
- Health and Medical Needs,
- Psychotropic Medication,
- Personal Rights and Social/Emotional Well-Being,
- Personal Needs/Survival and Economic Well-Being,
- Discharged Children, and
- Personnel Records.

For the purpose of this review, six placed children were selected for the sample. The placed children were pre-verbal and too young to be interviewed. During the home visits, the children were observed to be comfortable and well-cared for in the Certified Foster Homes (CFHs) and their Certified Foster Parents (CFPs) were observed to be responsive to the children's needs. The Contracts Administration Division (CAD) reviewed six case files to assess the level of care and services the children received. Additionally, four discharged children's files were reviewed to assess the FFA's compliance with permanency efforts. At the time of the review, the children were not prescribed psychotropic medication.

CAD reviewed five Certified Foster Parents (CFP) files and four staff files for compliance with Title 22 Regulations and County contract requirements. Interviews were conducted with five CFPs to assess the quality of care and supervision provided to children.

CONTRACTUAL COMPLIANCE

CAD found the following three areas out of compliance:

Certified Foster Homes

- The FFA was not conducting safety inspections every six months per the timelines approved in the FFA's Program Statement.
- The FFA did not conduct safety inspections every six months for four CFHs.

Recommendation:

The FFA's management shall ensure that:

1. Safety inspections are completed at least every six months or per the timeframes approved in the FFA's Program Statement and maintain supporting documentation of these safety inspections.

Maintenance of Required Documentation and Services Delivery

- The FFA did not obtain or document efforts to obtain the Department of Children and Families (DCFS) Children Social Worker's (CSW's) authorization to implement the Needs and Services Plans (NSPs).

One case file had one documented effort to obtain the DCFS CSW's signature on the Updated NSP due on September 6, 2015. Another case file had one documented effort to obtain the DCFS CSW's signature on the Updated NSP due on July 2, 2015, and two documented efforts on the quarterly NSP due on October 2, 2015.

- The FFA social worker did not develop timely, comprehensive Initial NSPs with the participation of the child.
- The FFA social worker did not develop timely, comprehensive Updated NSPs with the participation of the child.

One child's Initial and Updated NSPs were not timely or comprehensive. The child was placed with three different foster homes (June 12, 2014, June 19, 2014, and August 6, 2015) within the same FFA but the first Initial NSP had the first date of placement as June 19, 2015. The child's date of placement was incorrect which resulted in incorrect due dates for all the NSPs. In addition, the child was reassigned to another home on August 6, 2015; the FFA looked at the reassignment as a new placement and completed another Initial NSP that was due on September 6, 2015. This resulted in all the NSPs not being timely or comprehensive.

Recommendations:

The FFA's management shall ensure that:

2. The FFA obtains or documents efforts to obtain the DCFS CSW's authorization to implement the NSPs.
3. Timely, comprehensive Initial NSPs are developed with the participation of the child.
4. Timely, comprehensive Updated NSPs are developed with the participation of the child.

Personnel Records

- An employee did not sign and submit timely criminal clearances prior to the hire date.

An employee started working for the FFA on December 5, 2015, and her clearances were requested on March 2, 2016.

- An employee did not sign a criminal background statement in a timely manner.

An employee was hired on December 5, 2015, and signed the criminal background statement on March 1, 2016.

Recommendation:

The FFA's management shall ensure that:

5. Criminal Clearances (Department of Justice (DOJ), Federal Bureau of Investigation (FBI), and Child Abuse Central Index (CACI)) are signed and submitted timely.
6. Criminal background statements are completed and signed in a timely manner.

PRIOR YEAR FOLLOW-UP FROM DCFS CAD's FFA CONTRACT COMPLIANCE REVIEW

CAD's last compliance report dated January 12, 2016 (reviewed conducted in April 2015), identified three recommendations.

Results:

Based on the results of the current review, the FFA had fully implemented all recommendations for which they were to ensure that:

- Annual vehicle maintenance documentation for CFPs and designated drivers are maintained.
- CFPs conduct disaster drills and documentation is maintained.
- Clothing allowance logs are maintained.

The FFA representatives expressed their desire to remain in compliance with all Title 22 Regulations and contractual requirements. The FFA will consult with the Out-of-Home Care Management Division for additional support and technical assistance, and CAD will continue to assess contractual compliance during the next monitoring review.



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MAY 10 '16 AM 9:58

April 12, 2016

Helga Kiaian
Fiscal Compliance Administrator
County of Los Angeles
Department of Children and Family Services
Contracts Administration Division
3530 Wilshire Blvd, 5th Floor
Los Angeles, CA 90010

Dear Helga:

Below you will find our Corrective Action Plan for the finding identified in your Fiscal Compliance Assessment.

Question #18 Finding Response

WCC has changed its internal policy with regard to "Petty Cash". The \$481.02 check dated December 8, 2015 was the last check made payable to cash. Since that check, all petty cash checks have been made payable to Richard Klein and cashed at the local Comerica Bank branch office.

If you have any addition questions or need further clarification please do not hesitate to call.

Sincerely,

Richard Klein, Chief Financial Officer
Westside Children's Center

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May 27, 2016

Rosalind Arrington, CSA I, Contract Compliance Administrator
Department of Children and Family Services
Contract Administration Division
3530 Wilshire Blvd. 4th Floor
Los Angeles, CA. 90010

Re: FFA Review Summary of Findings – CAP Addendum

Dear Ms. Arrington,

Thank you so much for conducting our annual Foster Family Agency compliance review in 2016. All the families felt comfortable having you in their home and we appreciate all of your helpful feedback. Per this case review Westside Children's Center (WCC), is submitting the following responses and corrective action plans:

General Findings:

DCFS Finding #1: (Item #15) Safety inspections were not completed at least every 6 months or per the timelines approved in the agency's CCL approved Program Statement.

Corrective Action Plan: WCC has changed its internal tracking mechanism for the biannual safety inspection protocol so that home inspections are now being logged in the FosterTrak computer database. The FFA supervisor will print out the upcoming home inspections each month and assign a worker to complete the safety check by the deadline. The worker assigned will submit the completed safety inspection packet to the FFA supervisor for review. Any deficiencies will be noted, and the CFP will be notified of a deadline to complete any revisions to their homes. The social worker assigned will follow up with the CFP until the deficiencies have been resolved and will communicate the updates to the FFA supervisor. The FFA supervisor will log the dates of the completed safety inspections into the FosterTrak computer database and enter the new date due for the next 6 month inspection.

DCFS Finding #2: (Item #27) The FFA did not obtain or document efforts to obtain the County worker's authorization to implement the NSP.

Corrective Action Plan: Case workers were retrained on 3/28/16, on the NSP protocol. They will now make 3 attempts within the first week to obtain the CSW signature on the NSP. They will document these efforts as well by printing out each email with dates included and then stapling it to back to each NSP and filing a copy in the chart. The 1st email attempt will be addressed to the CSW. The 2nd attempt will include the CSW and CSW's supervisor. The 3rd attempt will include CSW, CSW supervisor, and the ARA. The



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FFA workers will notify the FFA supervisor if there is no response after the 3 attempts. The FFA supervisor will follow up with the CSW supervisor by email and/or phone to ensure that the NSP is reviewed and signed.

DCFS Finding #3: (Item #30) The FFA social worker did not develop timely, comprehensive, initial (NSPs) with the participation of the developmentally age-appropriate child.

Corrective Action Plan: On 3/28/16, the FFA Social Workers were retrained by FFA supervisor, in the development of initial NSPs, and now understand that a new initial NSP does not need to be completed when a child is transferred to another WCC home, the initial NSP is to be completed just one time, when a child is placed with the WCC FFA. The FFA supervisor will print out the upcoming initial and quarterly NSP due dates at the beginning of each month and double check that the initial NSPs are completed by the proper dates. The FFA supervisor will communicate directly with the FFA social workers to remedy any and all discrepancies in the timeliness of the initial NSPs.

DCFS Finding #4: (Item #31) The FFA social worker did not develop timely, comprehensive, updated (NSPs) with the participation of the developmentally age-appropriate child.

Corrective Action Plan: On 3/28/16, FFA Social Workers were retrained and now understand that the initial NSP is to be completed just one time, when a child is placed into WCC FFA, and that the quarterly update cycle should remain the same throughout the child's care, even if the child is transferred into a different WCC Foster Home. The FFA supervisor will print out the upcoming initial and quarterly NSP due dates at the beginning of each month, double check the past and upcoming due dates, and hand the printout to each social worker as a reminder. Each case-carrying social worker will log the dates of their own initial and quarterly NSPs into the FosterTrak computer database upon completion. The FFA supervisor will review the dates each month when the NSP log is printed to again double check that the initial and updated NSPs are completed in a timely manner. The FFA supervisor will communicate directly with the FFA social workers to remedy any and all discrepancies in the timeliness of the updated NSPs.

DCFS Finding #5: (Item #68) The criminal clearances (CAIC, DOJ, FBI) were not signed and submitted timely prior to employee's hired date.

Corrective Action Plan: WCC obtained the signed criminal clearance paperwork in a timely manner, but was late in submitting it, and did not receive the criminal clearance paperwork until 3/2/16.



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WCC has established a new protocol, which includes adding an Office Manager position to support HR in collecting all hiring documentation. The Office Manager will give the documentation to the Program Administrator to double check and verify that it is complete, including the association to the FFA license, prior to the start date of any new employee. The Office Manager will communicate in writing with HR to give the go-ahead prior to all new employees, consultants, contractors, or volunteers beginning service.

DCFS Finding #6: (Item #69) The appropriate employees did not sign a criminal background statements in a timely manner.

Corrective Action Plan: WCC obtained the signed criminal background statement in a timely manner, but was late in submitting it, and did not receive the criminal background statement until 3/1/16.

WCC has established a new protocol, which includes adding an Office Manager position to support HR in collecting all hiring documentation. The Office Manager will give the documentation to the Program Administrator to double check and verify that it is complete, including the association to the FFA license, prior to the start date of any new employee. The Office Manager will communicate in writing with HR to give the go-ahead prior to all new employees, consultants, contractors, or volunteers beginning service.

Please contact us if you need further clarification on our responses.

Best Regards,

Jill Rosenberg, MSW
Foster Care and Adoptions Supervisor